



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Docket Management Facility; U.S. Dept. of Transportation
1200 New Jersey Avenue, SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-001

Subject: Docket Number SLSDC 2007-0005

Dear Docket Management Facility:


The Wisconsin Dept. of Natural Resources submits the following comments on the proposed Seaway Regulations and Rules (December 31, 2007, 72 FR 74247). Based on the public notice the Saint Lawrence Seaway Development Corporation, DOT is requesting comments on the proposed regulations in 33 CFR s 401.30, "Ballast water and trim". We support the addition of requiring all foreign flagged vessels to conduct saltwater flushing of each ballast water tank that contains residual amounts of ballast water and/or sediment. We understand this to include ballast water ships and ships that have been identified as "No ballast water on board" or NOBOBs. We believe NOBOB ship should also be required do saltwater flushing of ballast water and/or sediments.

We further believe this is just an incremental step in improving the current regulations of ballast water and preventing the introduction of new invasive species into the Great Lakes. We know that salt water exchange does not kill all organisms such as virus' and bacteria, or those organisms that move between fresh and saline conditions. We firmly believe the US Coast Guard should be developing ballast water discharge standards beyond those in this proposed rule that protects the Great Lakes from introduction of all invasives. The State of Wisconsin is very concerned about the integrity of the Great Lakes ecosystem and believes that controlling ballast water discharges is key to preventing the spread of invasive species into this delicate ecosystem.

We need to control all ballast water discharges to the Great Lakes now, to prevent the spread of invasive species. We believe these proposed regulations are an initial step in improving the control, but they must be enforced and any deviation from this requirement must be addressed aggressively. This is necessary to protect the Great Lakes from further invasion of invasive species.

Everyday there is the potential for new introductions of aquatic invasive species, or the spread from one Great Lake port to another. Once the invasive establishes itself, the state and federal governments must address this problem and try to control them. In the last 10 years, over three billion dollars have been spent in the Great Lakes to mitigate the damage by one invasive species, the zebra mussel. The burden of reporting ballast water discharge or exchange does not compare to the billions of dollars that are spent by taxpayers to control invasives that have been brought to these waters through ballast waters.

Thank you for the opportunity to comment on these proposed changes to the current regulations.

Sincerely,

Todd Ambs, Administrator
Water Division